Remarks

In the present response, five claims (17 and 19-22) are amended; fourteen claims (1-14) are canceled; and three claims (23-25) are newly presented. No new matter is added. Claim 15-25 are presented for examination.

I. Claim Objections

Claims 20 and 21 are objected to as having informalities. Specifically, each claim should begin with a capital letter and end with a period. Claims 20 and 21 are amended to correct typographical errors involving punctuation.

Claims 17-18 and 21-22 are objected to because the term "classification rules" lacks antecedent basis. The claims are amended to provide proper antecedent basis.

II. Claim Rejections: 35 USC § 102(b)

Claims 15-16, 20, and 22 are rejected under 35 USC § 102(b) as being anticipated by "Exception Handling in Workflow Management Systems" (Hagen). Applicants respectfully traverse this rejection.

A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. See MPEP § 2131, also, *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Since Hagen neither teaches nor suggests each element in the claims, these claims are allowable over Hagen.

Independent claim 15 recites numerous recitations that are not taught or suggested in Hagen. By way of example, claim 15 recites three elements (a, b, and c) to predict exceptions. By contrast, Hagen discloses a model for detecting and handling an exception after the exception has already occurred. Thus, a large difference exists between claim 15 and Hagen. Claim 15 is directed to "predicting" exceptions, whereas Hagen is directed to "handling" exceptions after they have already occurred.

Applicants respectfully remind the Examiner that anticipation is established only when a single prior art reference discloses each and every element of a claimed invention united in the same way. RCA Corp. v. Applied Digital Data Systems, Inc., 730 F.2d 1440, 1444 (Fed. Cir. 1984). Hagen does not teach or even suggest predicting exceptions.

For at least these reasons, independent claim 15 and its dependent claims are allowable over Hagen.

As yet another example, claim 15 recites generating an exception **prediction** model based on data prepared from past workflow executions. Nowhere does Hagen teach or even suggest an exception prediction model. By contrast, Hagen teaches models for detecting an existing exception or handling an existing exception. As stated in section 5 (Exception Handling), Hagen discusses detecting exceptions and handling exceptions. Hagen, though, never mentions or suggests predicting exceptions before they occur using a prediction model.

Applicants respectfully remind the Examiner that anticipation under section 102 can be found only if a single reference shows exactly what is claimed (see, *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985)). Hagen does not teach or even suggest using a model to predict exceptions before the exceptions occur.

For at least these reasons, independent claim 15 and its dependent claims are allowable over Hagen.

As yet another example, claim 15 recites using the exception prediction model to generate a prediction of an exception for a current instance of a workflow. Nowhere does Hagen teach or even suggest using an exception prediction model to generate a prediction of an exception. By contrast, Hagen teaches models for detecting an existing exception or handling an existing exception. As stated in section 5 (Exception Handling), once an exception is detected, process goes to an exception handler. Hagen discusses detecting exceptions and handling exceptions. Hagen, though, never mentions or suggests predicting exceptions using a prediction model.

Applicants respectfully remind the Examiner that for a prior art reference to anticipate under section 102, "[t]he elements must be arranged as required by the claim," see M.P.E.P. § 2131, citing *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Hagen does not teach or even suggest using a model to generate a prediction for an instance of a workflow.

For at least these reasons, independent claim 15 and its dependent claims are allowable over Hagen.

III. Claim Rejections: 35 USC § 103(a)

Claim 21 is rejected under 35 USC § 103(a) as being unpatentable over Hagen. This rejection is traversed.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. For at least the following reasons, Applicants assert that the rejection does not satisfy these criteria.

As noted above in connection with section II, Hagen does not teach or suggest all the recitations of independent claim 15. Dependent claim 21 depends from independent claim 15. Thus, for at least the reasons provided in connection with independent claim 15, dependent claim 21 is allowable over Hagen.

IV. Claim Rejections: 35 USC § 103(a)

Claims 17-19 and 22 are rejected under 35 USC § 103(a) as being unpatentable over Hagen in view of "Web-Interface Driven Exception Handling in ADOME Workflow Management System" (Chiu). For at least the following reasons, this rejection is traversed.

As noted above in connection with section II, Hagen does not teach or suggest all the recitations of independent claim 15. Dependent claims 17-19 and 22 depend from independent claim 15. Thus, for at least the reasons provided in connection with independent claim 15, dependent claims 17-19 and 22 are allowable over Hagen.

V. New Claims

Newly added claims 23-25 recite numerous recitations that are not taught or suggested in the art of record.

CONCLUSION

In view of the above, Applicants believe that all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. 832-236-5529. In addition, all correspondence should continue to be directed to the following address:

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Respectfully submitted,

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